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Attorney for Defendants Martin Kao, Tiffany Lam, and
Society of Young Women Scientists and Engineers, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

MARTIN DEFENSE GROUP, LLC, AND
NAVATEK HOLDINGS LLC

Plaintiffs,
v.

MARTIN KAO; TIFFANY JENNIFER
LAM a.k.a. JENNY LAM and/or
TIFFANY KAO; LAWRENCE
KAHELE LUM KEE; CLIFFORD
CHEN; GARY AMBROSE; DUKE
HARTMAN; SOCIETY OF YOUNG
WOMEN SCIENTISTS AND
ENGINEERS LLC,

Defendants.

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**STATEMENT OF POSITION ON REPRESENTATION OF DEFENDANTS
TIFFANY JENNIFER LAM AND SOCIETY OF YOUNG WOMEN
SCIENTISTS AND ENGINEERS, LLC**

The undersigned, counsel of record for Defendants MARTIN KAO, TIFFANY JENNIFER LAM, AND SOCIETY OF YOUNG WOMEN SCIENTISTS AND ENGINEERS, LLC, hereby states, in response to this Court's request for a status report filed on January 26, 2024 regarding the representation of Defendants Tiffany Jennifer Lam and the Society of Young Women Scientists and Engineers, LLC as follows:

1. The undersigned will continue to represent Defendants Tiffany Jennifer Lam and the Society of Young Women Scientists and Engineers, LLC in this matter.

2. Defendant Tiffany Jennifer Lam is, consistent with her position in a state Circuit Court matter, intending on seeking separate counsel for her individually, but at this writing has not obtained separate representation. As such, the undersigned will continue to represent Tiffany Jennifer Lam unless she finds new counsel.

The undersigned also states that the law firm of Choi & Ito and attorney Michel Okazaki will be filing a notice of withdrawal of counsel for Defendants Martin Kao, Tiffany Jennifer Lam and the Society of Young Women Scientists and Engineers, LLC.

DATED: Honolulu, Hawaii, February 2, 2024.

/s/ Keith M. Kiuchi

KEITH M. KIUCHI

Attorney for Defendants Martin Kao, Tiffany
Jennifer Lam and the Society of Young Women
Scientists and Engineers, LLC